

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CASE NO. 3:18-CR-97
	:	
v.	:	(Judge Mariani)
	:	
ROSS ROGGIO	:	
Defendant	:	(electronically filed)

ROGGIO’S MOTION TO SUPPLEMENT EXHIBITS
IN SUPPORT OF MOTION FOR REVOCATION
OF THE DETENTION ORDER

Now comes the Defendant, Ross Roggio, by his attorney, Gino Bartolai, Esquire, and files the following Motion to Supplement Exhibits in support of his Motion for Revocation of the Detention Order and in support thereof avers the following:

1. On February 27, 2022, Roggio filed a Motion to Revoke the Detention Order issued by Magistrate Judge Joseph F. Saporito on February 17, 2022.

Roggio attached to his motion Defendant’s Exhibits 1-4.

2. The Government filed its response to Roggio’s Motion to Revoke the Detention Order on March 2, 2022.

3. On March 3, 2022, Roggio filed a reply to the Government’s response and attached thereto Defendant’s Exhibit 5 and 6.

4. Roggio is hereby seeking to supplement his exhibits in support of his Motion to Revoke the Detention Order with the addition of the attached Defendant's Exhibits 7, 8, and 9.

5. The undersigned counsel has discussed the substance of the within motion with Assistant United States Attorney Todd K. Hinkley who advises that he concurs in the within motion.

WHEREFORE, the Defendant, Ross Roggio, respectfully requests that this Honorable Court consider the attached Defendant Exhibits 7, 8, and 9, in support of his Motion to Revoke the Detention Order.

Respectfully submitted,

Date: March 12, 2022

s/Gino Bartolai, Esquire
Gino Bartolai, Esquire
Attorney ID# PA 56642

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Pittston, Pennsylvania 18640
(570) 654-3572
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Attorney for Ross Roggio

CERTIFICATE OF CONCURRENCE

I, Gino Bartolai, Esquire, certify that on this date I contacted Todd. K. Hinkley, Assistant United States Attorney, who advised that he does concur in the within **Motion to Supplement Exhibits.**

Date: March 12, 2022

s/Gino Bartolai
Gino Bartolai, Esquire

CERTIFICATE OF SERVICE

I, Gino Bartolai, Esquire, do hereby certify that I electronically served, via e-mail, a copy of the foregoing **Motion to Supplement Exhibits**, to the following

Todd K. Hinkley, Esquire
Assistant United States Attorney

and by placing the same in the United States mail, first class, postage prepaid, at Scranton, Pennsylvania, addressed to the following:

Ross Roggio

Date: March 12, 2022

s/Gino Bartolai
Gino Bartolai, Esquire